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December 31, 2002

RECEIVED

Marlene H. Dortch

Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

DEC 31 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

*Re: Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon
Addendum to the Petition for Temporary Waiver of
Section 20.18(c) and Extension of Time
CC Docket No. 94-102
ATTN: Wireless Telecommunications Bureau*

Dear Ms. Dortch:

Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon ("Ramcell of Oregon"), by its attorneys, hereby submits this letter, supplementing its current waiver petition on file which requests additional time to become capable of transmitting calls for 911 emergency calling from text telephone ("TTY") devices. Ramcell of Oregon is the licensee of Station KNKN393 in the Block B portion of the Oregon 5 - Coos RSA. Ramcell of Oregon hereby supplements its waiver petition to request until August 2003 to meet the obligations set forth in Section 20.18(c) of the Commission's rules regarding the ability of digital wireless systems to be capable of transmitting calls from TTY devices.

On June 28, 2002, Ramcell of Oregon submitted a timely request with the Commission for a limited waiver of Section 20.18(c) of the Commission's rules to meet the June 30, 2002 deadline for digital wireless systems to be TTY compliant ("Waiver Petition"). A copy of the Waiver Petition is attached. Therein, Ramcell of Oregon requested until December 31, 2002 to complete installation of the necessary hardware and software at its switch to comply with the Commission's rules. The Commission has not acted on Ramcell of Oregon's Waiver Petition.

Ramcell of Oregon's request for additional time is necessary in order to receive from its vendors and install the needed modifications to its network. Ramcell of Oregon explained in its Waiver Petition that it believed its switch "is capable of supporting TTY with the installation of minor software upgrades." Ramcell of Oregon is dependant upon

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its vendors to receive such upgrades. Ramcell of Oregon only now has been able to schedule installation dates to upgrade its switch that will enable it to comply with the Commission's TTY requirements.

Ramcell of Oregon is a small rural carrier. Its cellular system covers four sparsely populated counties in the state of Oregon. The largest of these counties has a population of little more than 100,400, and the smallest has approximately 21,150 people. Based on its size, Ramcell of Oregon is often among the last in line to purchase the requisite hardware and software from its vendors to become compliant with the Commission's regulatory deadlines.

Ramcell of Oregon is now scheduled to receive and install several upgrades to its current switch and equipment. With these upgrades, Ramcell of Oregon's system will be capable of transmitting 911 calls for TTY systems and projects that it will be able to meet the Commission's TTY obligations by August 2003. Accordingly, a further limited extension of the Commission's rules regarding the transmission of 911 TTY calls would serve the public interest and provide Ramcell of Oregon with the additional time it needs to install and finalize its equipment and switch upgrades.

Please contact the undersigned counsel with any questions you may have at (202)783-4141.

Sincerely,

Wilkinson Barker Knauer, LLP

By:

William A. Sill

Georgina L.O. Feigen

cc: Mindy Littell, Policy Division, Wireless Telecommunications Bureau
Andra Cunningham, Policy Division, Wireless Telecommunications Bureau

Attachment A

WILLIAM J. SILL
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June 28, 2002

COPY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: *Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon*
 Petition for Temporary Waiver and Extension of Time
 *CC Docket No. 94-102***

Dear Ms. Dortch:

On behalf of Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon ("Litchfield"), pursuant to CC Docket 94-102, Fourth Report and Order, we hereby submit this request for waiver and extension of time on implementation of TTY digital compatibility for 911 emergency calling for Station KNKN393 in the Oregon 5 (B Block) – Coos **RSA**.

Please contact the undersigned counsel with any questions you may have at (202)783-4141.

Sincerely,

Wilkinson Barker Knauer, LLP

By: /s/
 William J. Sill
 Anne H. Sullivan

Enclosure

Before the
Federal Communications Commission
Washington, DC

In the Matter of:

Revision of the Commission's Rules

To Ensure Compatibility With

Enhanced 911 Emergency Calling Systems)

CC Docket No. 94-102

To: Wireless Telecommunications Bureau

PETITION FOR TEMPORARY WAIVER AND EXTENSION OF TIME

Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon ("Litchfield"), pursuant to Section 1.3 of the Commission's Rules, requests a limited waiver of Section 20.18(c) of the Commission's rules to meet the June 30, 2002 deadline for digital wireless systems to be capable of transmitting calls from text telephone ("TTY") devices.

Litchfield, a small rural cellular carrier providing cellular service in the Oregon 5 RSA, continues to work diligently to ensure timely TTY access to E911 for all its customers. The absence of firm commitments has continued to be a major obstacle for small carriers such as Litchfield to obtain the software upgrades and equipment necessary to make Litchfield's system capable of transmitting TTY 911 calls. Litchfield believes its switch is capable of supporting TTY with the installation of minor software upgrades. However, Litchfield remains unable to order customer premise equipment ("CPE") capable of supporting TTY.

Even after general availability of CPE, Litchfield will need time to deploy and test the solution. Litchfield projects that it will take an additional 3-6 months from the receipt of the

CPE to test and implement TTY capabilities. Litchfield will continue to press its vendor for the necessary software upgrades and equipment necessary to meet a December 31, 2002 deadline.

Litchfield intends to complete the necessary hardware and software upgrades within a short time frame and become TTY compliant. Accordingly, a grant of the waiver would serve the public interest.

For the foregoing reasons, Litchfield requests a temporary waiver of Section 20.18(c) of the Rules and a brief extension of time until December 31, 2002 to complete its installation of the necessary hardware and software at all its switches to comply with the Commission's rules.

Respectfully submitted,

Litchfield County Cellular, Inc
d/b/a Ramcell of Oregon

By: /s/
Jeff Ramsey
General Manager
Litchfield County Cellular, Inc.
d/b/a Ramcell of Oregon

June 28, 2002